

**REMARKS**

Claims 1-20 are pending in this application. Reconsideration of this application is respectfully requested.

Applicant appreciates the courtesies shown to Applicant's representatives by Examiner Rogers and Examiner Baker in the October 26 personal interview. Applicant's separate record of the substance of the interview is incorporated into the following remarks.

The Office Action rejects claims 1-20 under 35 U.S.C. §103(a) as unpatentable over U.S. Patent Publication No. 2003/0063770 to Svendsen et al. ("Svendsen") in view of U.S. Patent No. 6,704,118 to Hull et al. ("Hull"). This rejection is respectfully traversed.

Independent claim 1 recites, *inter alia*, "an e-mail server for sending an e-mail formatted by said metadata acquisition service to the user wherein the user edits said e-mail by entering metadata values and sends said e-mail to said metadata acquisition service for storage and later retrieval by said repository manager." The combination of Svendsen and Hull does not disclose, teach or suggest such a feature.

The Office Action acknowledges at page 3, line 5, that Svendsen fails to teach an email server and relies upon Hull to fill that deficiency. Applicant respectfully asserts that even if it would have been obvious to combine the Svendsen and Hull references, which Applicant submits it would not, the Svendsen/Hull combination would fail to teach all the features recited in claim 1.

For example, as discussed during the October 26 interview, Hull merely discloses a LAN connected archiving system that is able to connect to an office local area network (LAN) that "may interconnect a variety of devices, such as a copier, a printer, a facsimile machine, a client computer, an email server, a document management workstation and the like. Whenever a document is copied, printed, faxed, emailed, or the like a document image can be archived by the document management workstation **without further user**

**intervention**. A single user command results in the document being copied and archived, printed and archived, faxed and archived, or emailed and archived." (See Hull, Abstract and col. 1, lines 55-63.) Applicant respectfully submits that the email system in Hull is merely a source of content to be archived and does not send "an e-mail formatted by [a] metadata acquisition service to [a] user wherein the user edits said e-mail by entering metadata values and send[ing] said e-mail to said metadata acquisition service for storage and later retrieval by said repository manager," as recited in claim 1.

Further, Applicant respectfully submits that Svendsen fails to disclose, teach or suggest "an e-mail server for sending an e-mail formatted by said metadata acquisition service to the user wherein the user edits said e-mail by entering metadata values and sends said e-mail to said metadata acquisition service for storage and later retrieval by said repository manager," as recited in claim 1. For example, in Svendsen, metadata is associated with a picture by a user selecting one of a plurality of "universal schema" and inputting metadata based upon the schema. (See Svendsen, paragraph [0050].) Such an approach is not in any way similar to the email-based metadata collection approach recited in claim 1.

In addition, as noted during the interview, Svendsen discloses, at paragraph [0054], sending an email message to non-registered users inviting them to register to use the system described in Svendsen; however, nowhere does Svendsen disclose, teach or suggest applying metadata to a scanned image that is collected via an email exchange, as recited in claim 1.

For at least these reasons, it is respectfully submitted that independent claim 1 is patentably distinguishable over the applied art. Independent claims 11 and 20 include features similar to the feature described above with respect to claim 1 and are patentably distinguishable over the applied art for at least the same reason. The remainder of the claims depend from one of independent claims 1, 11 and 20 and are likewise distinguishable over the

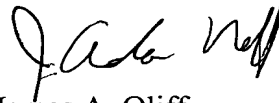
applied art for at least the reasons discussed above, as well as for additional features they recite. Accordingly, withdrawal of the rejection is respectfully requested.

\* \* \* \*

For at least these reasons, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-20 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,



James A. Oliff  
Registration No. 27,075

J. Adam Neff  
Registration No. 41,218

JAO:JMH

Date: December 9, 2005

**OLIFF & BERRIDGE, PLC**  
**P.O. Box 19928**  
**Alexandria, Virginia 22320**  
**Telephone: (703) 836-6400**

<p>DEPOSIT ACCOUNT USE AUTHORIZATION Please grant any extension necessary for entry; Charge any fee due to our Deposit Account No. 15-0461</p>
--